- 2-1. Verizon If a third garage is called when the primary garage and secondary garage yields no takers, how long, on average, does the process of attempting to contact a response crew take?
- 2-2. Verizon Is Verizon obligated to go through its call list at a primary or secondary garage if it is generally known that the particular garage has a very low response rate? If yes, is this required even if Verizon has confirmed that an emergency exists and a crew is required?
- 2-3. Verizon Please provide the location of the second and third Verizon garages (called when the primary garage yields no response) for Verizon's maintenance areas in the capital and seacoast service areas. Please provide the residences (limited to name of town or municipality) of the technicians assigned to these second and third garages. Please provide the driving time between the residences of each of the technicians and the garages to which they are currently assigned.
- 2-4. Verizon Verizon indicated, during the 1/17/06 tech session, that greater than 60% of all calls to its Emergency Response Center (ERC) originate from the electric company. Please indicate in what percent and from whom the remaining calls originate.
- 2-5. All If notified by local officials (e.g., police, fire) of an emergency, do you immediately dispatch a crew/technician to the scene? If not, why not? How is the decision made (based on what information) to send appropriate personnel?
- 2-6. All Please identify any protocol or procedures used by the utility for notification of the emergency management personnel of a licensing municipal, including but not limited to fire or police personnel, or of the state, in the event of an emergency, that pertains to the utility poles in the rights of way.
- 2-7. All Please identify in the protocol or procedures described in #2-6, above, the state and local departments and/or individuals to be notified, the timing for such notification during such an emergency and the sequence of departments or individuals notified.
- 2-8. All State and municipal emergency personnel direct most of their calls, during pole emergencies, to the electric companies. How might the utilities ensure that emergency personnel contact the Verizon ERC, as well as the electric companies, during these emergencies?
- 2-9. All -- How do the electric companies, normally first on-scene to a pole emergency, feel about continuing to contact the Verizon ERC with the initial damage

- assessment if state and emergency personnel include Verizon as one of their initial contacts?
- 2-10. PSNH -- PSNH has a local agreement with Verizon in the Rochester/Somersworth area that allows them to set a pole in a Verizon maintenance area after PSNH has contacted Verizon and there is no response by Verizon within two hours. Please supply data that documents how often PSNH used this option in the last 18 months?
- 2-11. All Would adherence to routines suggested in questions #2-8 & #2-9 eventually eliminate the need for local agreements?
- 2-12. Verizon Please provide the definition of "immediate response" as used in Verizon's response to Staff 1-3. Please describe the steps that Verizon takes to verify whether its expectation of an "immediate response to all emergencies" is being met frequently, sometimes or not at all. Please provide any data in Verizon's possession to support this response. Please describe how Verizon's procedures, organizational design and contract provisions ensure this objective.
- 2-13. Verizon Please confirm that in its response to Staff 1-4, Verizon's reference to the lack of provisions in the contract regarding "paid standby" means that Verizon has no field crews or emergency response personnel on paid standby during nights and emergencies.
- 2-14. Verizon Please confirm that Verizon's response to Staff 1-5 means that Verizon has no supervisory or management personnel on standby during weeknights from 3:00 p.m. until 7:00 a.m., and on weekends. If this is not correct, please provide the number of such supervisory or management personnel.
- 2-15. Verizon Where is the Verizon Emergency Response Center located?
- 2-16. Verizon Does Verizon set a limit as to how far a technician may be expected to travel in order to respond to an emergency, before it will excuse that technician from responding and seek another?
- 2-17. Verizon Are the supervisors referred to in Verizon's response to Staff 1-7 on standby?
- 2-18. Verizon Other than maintaining an Emergency Response Center and implementing a storm preparedness plan as described in Verizon's response to Staff 1-8, please specify the steps Verizon takes to ensure that an adequate number of technicians are available to provide an "immediate response" to emergency calls.

- 2-19. Verizon What is the company's response time objective for the time required from when an emergency call is received by the Emergency Response Center to when a crew, who is willing to respond, is notified of a duty call?
- 2-20. Verizon Regarding Verizon's response to Staff 1-11, please describe Verizon's understanding of its obligations to respond to an emergency call in (a) an electric utility's maintenance area, and (b) Verizon's maintenance area.
- 2-21. Verizon Verizon indicated, during the 1/17/06 tech session, that it has started tracking tech response time to emergencies. Please supply the data collected in the last 18 months.
- 2-22. All Please provide the response times from Verizon garages in Greenland and Somersworth for the last six months? Please provide the number of times when Verizon was not available to respond and identify each event as accurately as possible.
- 2-23. Verizon Please supply information concerning the October 2005 pole emergency in Rochester where a Verizon line crew dispatched from Augusta, Maine assisted PSNH with a broken pole?
- 2-24. Verizon How does Verizon inspect the poles that its technicians have not climbed?
- 2-25. Verizon Regarding Verizon response 1-13, please explain how Verizon complies with NESC 214A4 if such records are not maintained in the normal course of business.
- 2-26. Verizon Please provide the actual number of full time employees assigned to pole setting, transfer and removal activities during 2005, broken out by specific garage.
- 2-27. Verizon Regarding Verizon's response to Staff 1-9, are all of these after-hours (3:00 p.m. to 7:00 a.m.) calls? Please clarify the timeframe that is measured in the provided 'arrival' times. i.e., what is the start time (time first call is received, time technician is dispatched, or other?), and what is the end time (arrival at the work center, arrival on the scene, or other?).
- 2-28. Verizon Please provide copies of all written protocols used by Verizon to determine size and location of poles, including but not limited to, priority for installation and repair schedules.
- 2-29. Verizon Does the ERC require call-backs from the technicians when they arrive on an emergency site? If not, what other means are used to document and track response times?

- 2-30. All Please provide for the last six months all documentation associated with keep cost work orders involving the replacement and or repair of poles and conduit due to motor vehicle or construction accidents in New Hampshire. The documentation should include the work order and final billing invoice and clearly identify the incident location, date, crew hours and the charges for time and material. It is requested that the information be provided in chronological order as determined by the specific date of the event causing the damage.
- 2-31. Verizon In response to Staff 1-7, Verizon responded that "The geography area assigned to a supervisor varies by geography and garage location. Generally, Verizon will utilize the primary garage or the nearest two garages to cover an emergency response." Please provide for year 2005 the number of incidents requiring the utilization of resources from other than the primary garage and provide specific detail in regards to incident location and the specific garages involved in the response, including the identification of the garage or garages that could not respond.
- 2-32. Verizon In response to Staff 1-25, Verizon provided a chart reflecting the number of assigned digger and placer trucks located in New Hampshire as of December 2005. For year 2005 please provide the actual in service utilization of the New Hampshire fleet broken out by the digger truck and placer truck categories, stated as percent utilized versus theoretical availability. For clarity, the request is seeking the percentage of actual fleet utilization (total assigned capacity less equipment down time).
- 2-33. In 2005 what percentage of digger truck and placer truck down time was attributed to maintenance and or equipment breakdown versus technician shortage due to incidental absence, vacation, training, long-term disability or other personnel factors?
- 2-34. All With respect to Staff question 1-19, please identify the steps that are taken to notify a licensing municipality of changes in the field that affect the terms or conditions of the license granted for that specific pole location, including, but not limited to the location of the pole itself.
- 2-35. All With respect to Staff question 1-37, please state the procedure used within the utility to respond to a notice of removal received from a municipality or the state pursuant to RSA 231:177 through 182 inclusive.
- 2-36. All With respect to Staff question 1-1, please identify whether, at any time covered by data requests in this proceeding, the Commission has ordered specific emergency response procedures to be implemented, and if so how the costs of such implementation are recovered.